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Office of Enforcement, Compliance
and Environmental Justice (Water)

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File Number: 28EN-246319

October 19, 2016

VIA FEDEX

U.S. EPA Region 8 (8ENF-W-NP)
NPDES Enforcement Unit
Attn: Laurel Dygowski
1595 Wynkoop Street
Denver, CO 80202-1129

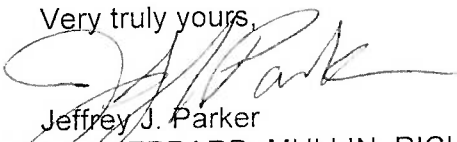
Re: Response by Hoffman Southwest Corp. to EPA Request for Information Pursuant to
Section 308 of the Clean Water Act (Ref: 8ENF-W-NP)

Dear Ms. Dygowski:

Enclosed is my client Hoffman Southwest Corp.'s response to the EPA Request for Information Pursuant to Section 308 of the Clean Water Act (Ref: 8ENF-W-NP). Also enclosed is a USB flash drive containing a PDF filed named "HSW 0001-HSW 0377(2016-10-19).pdf," which are the company's documents responsive to the request. The documents are Bates numbered HSW 0001 through HSW 0377.

Please contact me if you have any questions regarding the enclosures.

Very truly yours,



Jeffrey J. Parker
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

SMRH:479593543.1
Enclosures

Response by Hoffman Southwest Corp. to EPA Request for Information
Pursuant to Section 308 of the Clean Water Act (Ref: 8ENF-W-NP)

The following information is provided for the time period of September 1, 2013, through the date of this response for services provided in Colorado by Hoffman Southwest Corp. (the "Company"):

Because EPA's Information Request seeks information regarding activities that involve the removal of liquids and/or solids from "storm water sewers" or "storm drains" and subsequent disposal or treatment of such liquids and/or solids, the Company understands the phrases "storm water sewer cleaning and/or maintenance services," "storm water sewer services," and "storm drain cleaning" to refer to activities involving the removal of liquids/solids from storm water sewers, sanitary sewers, and storm drains and subsequent disposal or treatment of those liquids/solids only and provides the following responses and information related to such activities. The Company began operations in Colorado in April 2014, so this response covers the time period from then until the date of this response.

1. Describe the storm water sewer cleaning and/or maintenance services that the Company provides.

RESPONSE: When requested by a customer to remove solids/debris from a storm water or sewer pipe, the Company will do so if the design and construction of the underground piping allow for such removal (i.e., when there are manholes before and after the blockage, interference, or impingement of flow). In those situations, the Company will spray high-pressure water into the upstream manhole to flush the accumulated debris/blockage from pipe and remove the solid materials and some liquid from the pipe through the downstream manhole. The solids and liquids removed from the pipe are collected in a vacuum truck and hauled to and disposed of at a location generally designated by the customer.

In Colorado, the Company also provides the following services that do not involve the removal of solids or liquids from the pipe or disposal by the Company: (1) remote control video inspection of pipes and debris within pipes, sometimes coupled with spraying of high-pressure water to loosen accumulated debris to allow adequate video inspection; (2) spraying of high-pressure water to flush accumulated debris/blockages from pipe to allow storm or sewer water to flow through pipe; and (3) spot repairs of sewer pipe subsequent to cleaning methods described above.

- 2. For each of the storm water sewer services that the Company provided from September 1, 2013, through the date of your response, identify the following:*
- a. The name and address of the Company or governmental entity to which the services were provided.*
 - b. The date(s) that the Company provided those services.*
 - c. All documents that evidence the services provided including, but not limited to, the following: invoices, billing statements, written agreements, vehicle logs, manifests, and/or all other equivalent documents.*

- d. The volume of the vacuum trucks used during each of these services. Provide photos of each of the vacuum trucks owned and operated by the Company.*
- e. Provide the frequency that the vacuum trucks have been washed out and the disposal location of the tank liquid wash out.*

RESPONSE:

Customer No. 1:

- a. Layne Inliner, LLC– 7915 Cherrywood Loop, Kiowa, CO 80117
- b. Multiple sewer projects from May 15, 2015 through Present:
 - Grand Junction City Shops Rehabilitation (project owner City of Grand Junction) – June 22, 2016
 - Aspen 2016 Sewer Rehabilitation (project owner Aspen Consolidated Sanitation District) – May 3, 2016 to June 14, 2016
 - City of Brighton Sewer Rehabilitation - CIPP (project owner City of Brighton) – May 19, 2015 to June 30, 2016
 - Colorado Spring Utilities: Task Order 64 and Task Order 65 (project owner Colorado Spring Utilities) – August 2015
 - City of Boulder Sewer Rehabilitation - CIPP (project owner City of Boulder) – September and October 2015
- c. The responsive documents are being produced herewith.
- d. Approximately 12-15 cubic yards. See photos produced herewith.
- e. Tanks are rinsed at the waste treatment plant immediately following a load being emptied.

Customer No. 2:

- a. Insituform Technologies, 9654 Titan Court, Littleton, CO 80125
- b. Aurora Storm Sewer CMP Rehab – Task 2 Job 170857 – August 26, 2016 and September 8, 2016
- c. The responsive documents are being produced herewith.
- d. Approximately 12 -15 cubic yards
- e. Tanks are rinsed at the waste treatment plant immediately following a load being emptied.

3. Describe each and every method of disposal employed by the Company for the liquids and solids that result from storm water sewer cleaning services (i.e., land application, surface disposal, disposal into a wastewater treatment facility, disposal into a storm water drain, and/or manhole).

RESPONSE:

For jobs involving sanitary sewer work, the vacuor tank initially contains liquids and solids. Liquids are decanted back into the sewer system during the jobs. Solids are hauled to a waste

water treatment facility where the solids are then placed in a drying bed at the waste water treatment facility.

For jobs involving storm drain work, the liquids and solids removed from the storm drain are transported to the designated waste water treatment plant for disposal. Once at the waste water treatment facility, fluids are decanted into an area designated by the facility operator. Solids/debris are then taken to a drying bed within the same facility.

4. If the method of disposal of the liquids and/or solids that resulted from storm drain cleaning services, as listed in item #3, above, was to land or any other surface disposal, please provide the following information:

- a. A list of all land application and disposal location utilized. Include the name, contact information, and address for each property owner who authorized such disposal. Include the size of the site in acreage, the section, township, and range in which the site is located or the Global Positioning System coordinates, if available.*
- b. Provide the total gallons applied to each site.*
- c. Describe the equipment, container, or truck used to transport the liquids.*
- d. Describe whether the equipment, container, or truck used to transport the liquids had a meter, electronic or otherwise, to measure the volume of liquids. If so, provide the volume of liquid in the container or equipment before disposal and after.*
- e. All documentation relating to the disposal, including, but not limited to, the following: invoices, written agreements, manifests, disposal logs, and/or billing statements between the Company and the owner of the site.*
- f. Describe any treatment of the liquids and/or solids that took place prior to the application or disposal.*

RESPONSE:

- a. Not applicable – no disposals have occurred at land/surface facilities
- b. Not applicable.
- c. Not applicable
- d. Not applicable.
- e. Not applicable.
- f. Not applicable.

5. If the method of disposal of the liquids and/or solids, as listed in item #3, above, was to a wastewater treatment facility, provide for each instance of a disposal and, if so, provide the following information:

- a. Each date that the liquids and/or solids were delivered to the wastewater treatment facility.*
- b. The name of the wastewater treatment facility and its address.*
- c. Describe whether the equipment, container, or truck used to transport the liquids and solids had a meter, electronic or otherwise, to measure the volume of liquids. If so, provide the volume of liquid in the container or equipment before disposal and after.*

- d. All documentation relating to the disposal, including, but not limited to, the following: invoices, written agreements, manifests, disposal logs, and/or billing statements between the Company and the owner of the site.*
- e. Describe any treatment of the liquids and/or solids that took place prior to the application or disposal.*
- f. Provide the name of each individual at the wastewater treatment facility that had authorized disposal at the facility.*

RESPONSE:

Disposals related to sanitary sewer work:

Grand Junction City Shops Rehabilitation project

- a) June 22, 2016
- b) Persigo Wastewater Treatment Plant (2145 River Rd, Grand Junction CO 81505 ph. 970-256-4180)
- c) The tank has a float to roughly measure how full the tank is. Actual measurements, when required by the waste water treatment facility operator, are done at the waste water treatment facility as the load is emptied.
- d) The responsive documents are being produced herewith. Because the project owner (the City of Grand Junction) owns the piping and contents, as well as the wastewater treatment plant where the load is taken, it does not issue manifests for loads taken at its direction.
- e) None
- f) The General Contractor is responsible for arranging disposal facilities, and it directs the Company which facilities to use. Upon arrival at the facility, the truck drivers indicate what project they are working on and are directed by the facility employee where to dump.

Aspen 2016 Sewer project

- a) Multiple disposals between May 3, 2016 and June 14, 2016
- b) Aspen Consolidated Sanitation Treatment Facility, 400 Service Center Rd., Aspen, CO 81611 ph. 970-925-7262)
- c) Tank has a float to roughly measure how full the tank is. Actual measurements, when required by the waste water treatment facility operator, are done at the waste water treatment facility as the load is emptied.
- d) The responsive documents are being produced herewith. Because the project owner (the Aspen Consolidated Sanitation District) owns the piping and contents, as well as the treatment facility where the load is taken, it does not issue manifests for loads taken at its direction.
- e) None
- f) The General Contractor is responsible for arranging disposal facilities, and it directs the Company which facilities to use. Upon arrival at the facility, the truck drivers indicate what project they are working on and are directed by the facility employee where to dump.

City of Brighton Sewer Rehabilitation

- a) Multiple disposals between May 19, 2015 to June 30, 2016
- b) Brighton Wastewater Treatment Facility, 325 N. Kuner Rd., Brighton, CO 80601
- c) Tank has a float to roughly measure how full the tank is. Actual measurements, when required by the waste water treatment facility operator, are done at the waste water treatment facility as the load is emptied.
- d) The responsive documents are being produced herewith. Because the project owner (the City of Brighton) owns the piping and contents, as well as the wastewater treatment plant where the load is taken, it does not issue manifests for loads taken at its direction.
- e) None
- f) The General Contractor is responsible for arranging disposal facilities, and it directs the Company which facilities to use. Upon arrival at the facility, the truck drivers indicate what project they are working on and are directed by the facility employee where to dump. (City Contact: Scott 303-994-6986)

Colorado Spring Utilities: Task Order 64 and Task Order

- a) One disposal in August 2015
- b) Las Vegas Wastewater Treatment Facility, 703 E Las Vegas Street, Colorado Springs, CO 80903
- c) Tank has a float to roughly measure how full the tank is. Actual measurements, when required by the waste water treatment facility operator, are done at the waste water treatment facility as the load is emptied.
- d) The responsive documents are being produced herewith. Because the project owner (the Colorado Spring Utilities) owns the piping and contents, as well as the wastewater treatment plant where the load is taken, it does not issue manifests for loads taken at its direction.
- e) None
- f) The General Contractor is responsible for arranging disposal facilities, and it directs the Company which facilities to use. Upon arrival at the facility, the truck drivers indicate what project they are working on and are directed by the facility employee where to dump.

City of Boulder Sewer Rehabilitation - CIPP

- a) Two disposals in September and October 2015
- b) 75th Street Waste Water Treatment Facility, 4049 North 75th Street, Boulder, CO 80301
- c) Tank has a float to roughly measure how full the tank is. Actual measurements, when required by the waste water treatment facility operator, are done at the waste water treatment facility as the load is emptied.
- d) The responsive documents are being produced herewith. Because the project owner (the City of Boulder) owns the piping and contents, as well as the wastewater treatment plant where the load is taken, it does not issue manifests for loads taken at its direction.
- e) None

- f) The General Contractor is responsible for arranging disposal facilities, and it directs the Company which facilities to use. Upon arrival at the facility, the truck drivers indicate what project they are working on and are directed by the facility employee where to dump.

Disposals related to storm sewer work:

Aurora Storm Sewer CMP Rehabilitation – Task 2 (project owner City of Aurora)

- a) 8/26/16 and 9/8/16
- b) Waste Management of Colorado, Inc./Conservation Services, Inc., facility at 41800 E. 88th Avenue, Bennett, CO 80102
- c) Tank has a float to roughly measure how full the tank is. Actual measurements are done at the waste water treatment facility as the load is emptied.
- d) The responsive documents are being produced herewith.
- e) None
- f) Kim Aguilar (per manifest, which is included in documents being produced)

6. *If the method of disposing of liquids and/or solids as listed in item #3, above, was to a storm drain or manhole, provide the following information for each disposal:*

- a. *State the date and time of each disposal.*
- b. *For each disposal, state the total number of gallons.*
- c. *State the total capacity of the equipment or container from which liquids and/or solids were disposed.*
- d. *The latitude, longitude, datum, county, township, range, quarter sections and fractions for rural areas, mileposts, and manhole numbers, if applicable.*
- e. *If known, describe the weather conditions during the time of disposal (i.e. temperature, precipitation, cloud cover).*

RESPONSE: Not applicable

7. *If liquids and/or solids were disposed of into a storm water drain or manhole during any service, state if that drain or manhole threatened to or did reach any waterway or body of water, including but not limited to wetlands, marshes, or sewers. If it did, provide the following:*

- a. *Provide the name of the waterway or body of water. Describe the waterway or body of water, including its width, depth, flow rate, the direction of flow, and its condition during the time of the disposal (i.e. low, flooding, dry).*
- b. *If known, state the use of each waterway or body of water (i.e. agricultural, drinking).*
- c. *Describe the overland pathway(s) from the location of the disposal to the waterway or body of water.*
- d. *List any pollutant that was present in the liquids and/or solids. If known, state the quantity, in gallons, and the type of pollutant.*
- e. *List each, if any, pollutant disposed of that meets the definition of "hazardous substance" in section 101 (14) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. § 9601(14).*
- f. *If the Company observed the liquids and/or solids entering any waterway or body of water, describe any film, sheen, color, or iridescent appearance that may have been observed on the surface of the waterway or waterbody and its adjoining shorelines.*

Provide the name, title, and business telephone number of the person making that observation.

RESPONSE: Not applicable.

8. List any federal, state, tribal or local agencies that may have been aware of or notified of any disposal. Indicate the date and time of each notification and the name, telephone number, and address of each official.

RESPONSE: The cities of Grand Junction, Aspen, Brighton, Colorado Springs, and Boulder, which operate the facilities at which the disposals for Customer No. 1 took place, were aware of and authorized the disposals at their facilities. The notifications took place each time that a truck entered such facility. For Customer No. 2, the City of Aurora was aware of and directed the Company to dispose of the materials at the locations and in the manner that occurred, and was the generator on the accompanying manifest.

9. List the name, address and business telephone number of each individual answering each item in this Request and describe that individual's relationship to the Company (i.e. employee, contractor).

RESPONSE:

- Dean Monk, Director of Pro-Pipe Operations, 23311 Madero, Mission Viejo, CA 92691 (949) 380-4161
- Nick Laneau, Regional Manager, 23311 Madero, Mission Viejo, CA 92691 (949) 380-4161

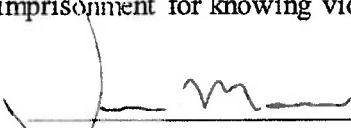
10. If the Company conducts storm water sewer services in Utah and the disposal method(s) of the liquids and/or solids resulting from the cleaning of storm drains differs from the methods of disposal that the Company provided in response to item 3, above, provide a narrative as to how those methods are different and list the additional methods.

RESPONSE: Not applicable. A separate corporation under common ownership with the Company conducts operations of the same nature as the operations of the Company described above.

STATEMENT OF CERTIFICATION

Response to Request for Information Pursuant to Section 308 of the Clean Water Act

I certify under penalty of law that this response and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations.



Dean Monk

Director of Pro-Pipe Operations

October 19, 2016

Date